



October 21, 2025

Board of Directors and Members
Engineers and Geoscientists BC

RE: AGM MOTION TO DISCOURAGE SPECIFYING GAS-FIRED EQUIPMENT

Directors and Members,

My organization, the Independent Contractors and Businesses Association (ICBA), is Canada's largest construction association with 4,500 member companies and clients working in all aspects of building infrastructure and housing. ICBA is based in British Columbia and is the single largest sponsor of trades apprentices in our province. We are generally reluctant to comment on matters before other associations, but our members have brought to our attention a motion on natural gas that your group will consider at its AGM. **ICBA urges your Board and membership to reject the motion to discourage specifying gas-fired equipment.**

Engineers and Geoscientists BC exists to protect the public interest by setting and maintaining professional standards – not to choose winners and losers among code-compliant energy systems. Your own “About Us” webpage is unequivocal in this regard: EGBC’s core purpose is to protect the public interest by setting and maintaining high academic, experience, and professional practice standards – not to choose winners and losers among code-compliant energy systems. The guiding principle is: keep the standards high; keep the regulator neutral. That’s a vital mandate. It is not a mandate to micro-manage B.C.’s energy system.

The AGM motion before you would push EGBC into policymaking by instructing registrants to “avoid specifying gas-fired equipment... wherever technically feasible,” flipping the burden of proof onto anyone who wants to consider high-efficiency gas. That’s not “modern regulation”; it’s a prescriptive fuel preference that narrows professional judgment, elevates ideology over engineering, and invites complaint-driven discipline for perfectly responsible designs. If adopted, it turns the regulator into a gatekeeper.

We recognize EGBC’s 2025 Climate Change Position Statement and Climate & Sustainability program, which encourages registrants to consider climate change in professional practice and design through a low-carbon resilience lens, and to discuss and document climate-related risks, trade-offs, and decisions with clients. Those expectations are about professional judgment and transparency – not prescribing a particular fuel. They are compatible with a technology-neutral regulator.

Our members greatly respect and appreciate the role of engineers and geoscientists in the construction process, but let’s be clear on roles. Engineers must be free – indeed, they are obligated – to evaluate safety, reliability, emissions, lifecycle performance, cost, and client needs,

and then select the best fit. Sometimes that's an efficient heat pump. Sometimes it's hybrid systems. Sometimes it's high-efficiency gas with heat recovery, CHP, district energy, or renewable natural gas (RNG) pathways. The public interest is served when professionals are technology-agnostic and evidence-driven, not when they are told to "avoid" an entire class of equipment regardless of context.

There are three practical reasons why we believe this motion is unsound:

1. **It overreaches EGBC's mandate.** Regulating competence and ethics is your job; dictating fuel choices and micro-managing energy use is not. EGBC's own mission is to "serve the public interest as an inclusive, progressive, and future-focused regulator" – not a parallel energy ministry. Keep the standards high; keep the regulator neutral.
2. **It ignores system realities and affordability.** B.C. is accelerating electrification, and BC Hydro is scrambling to procure thousands of gigawatt-hours of new clean supply to keep up. Even Hydro's latest planning documents acknowledge the need for additional calls for power – around 5,000 GWh/year in the 2025 call alone – because demand is outpacing existing capacity. In addition, the province is becoming more dependent on imports of electricity from other jurisdictions which that rely on fossil fuel plants to generate a significant portion of their base load power. A regulator-imposed push to "avoid" gas in B.C. by default piles load onto a grid that is already racing to add supply, and it risks higher capital and operating costs for homeowners, small businesses, hospitals, schools, and industry. That is not prudent risk management.
3. **It ignores the climate value of gas where appropriate.** B.C. is a major natural gas producer – 36% of Canada's output, with production roughly doubling over the past decade. The sector underpins tens of thousands of jobs and billions in GDP, particularly in northern B.C. The provincial government is racing to promote the production and export of LNG as a key part of its strategy to advance economic development. Natural gas also plays a role in cutting emissions when it displaces higher-carbon fuels – globally and in specific industrial and thermal use-cases. The International Energy Agency has shown that switching from coal to gas cuts lifecycle emissions by ~50% for power and ~33% for heat. With LNG Canada now producing and the province continuing to advance export capacity, B.C. can deliver lower-emissions energy to coal-dependent markets while we continue to decarbonize at home. A regulator should not pre-decide against the very technology that, in the right application, reduces global emissions and supports our economy.

To be crystal clear: ICBA supports realistic, technology-neutral decarbonization. We champion innovation – advanced heat pumps, heat recovery, electrification where it pencils, RNG, hydrogen blending pilots, better envelopes, modern controls, and load management. But progress happens when you demand rigorous comparative analysis, not when you demand a predetermined answer. Engineers do their best work when they are asked to optimize, not to justify deviations from a ban-by-stealth.

Education is welcome, if it's balanced. If EGBC wants to "strengthen educational resources," do it in a way that sharpens professional judgment across *all* lawful options: lifecycle carbon accounting (including embodied and peak-day performance), reliability, seismic/fire safety, capital and operating costs, and client risk tolerance. Don't tilt the playing field by instructing registrants to "avoid" gas first and reason second. Your Position Statement emphasizes tools, continuing education, and guidelines (e.g., Sustainability Professional Practice Guidelines) to help registrants integrate climate considerations. ICBA supports strengthening these resources, without predetermining outcomes on lawful equipment.

What this motion would do, in practice, is chill legitimate professional practice. It would make engineers hesitant to specify efficient gas even where it is the best solution for safety, resilience, emissions, and cost – because they know the regulator has already signaled a preferred outcome. That's a disservice to the public, and it is squarely at odds with EGBC's purpose.

A better path is simple:

- Reaffirm EGBC's technology neutrality and the primacy of professional judgment grounded in evidence, codes, and client needs.
- Replace any "avoid gas" language with a requirement for *transparent, comparative, lifecycle* design analysis across viable options (electric, hybrid, gas, district energy, waste heat, etc.), including peak conditions and resilience.
- Offer balanced education on both electrified and gaseous systems, including RNG and future hydrogen compatibility, without prescribing outcomes.

Engineers are not political surrogates or political activists. They are guardians of safety and problem-solvers who should be free to use every lawful tool and technology to deliver reliable, affordable, lower-carbon buildings. Keep EGBC focused on what it does best: regulating competence, ethics, and public safety – and let engineers engineer.

On behalf of Canada's largest construction association and the thousands of contractors and tradespeople we represent, we urge you to reject this motion and keep EGBC out of the business of fuel politics.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Gardner". The signature is fluid and cursive, with a prominent initial "C".

Chris Gardner

President and CEO

INDEPENDENT CONTRACTORS AND BUSINESSES ASSOCIATION